

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
                                  )  
Plaintiff,                   )  
                                  )  
v.                            )                                   No. 4:16 CR 157 AGF  
                                  )  
                                  )  
SHAUN HAYES,               )  
                                  )  
Defendant.                   )

**UNITED STATES' RESPONSE TO DEFENDANT'S MOTION TO CONTINUE**

Comes now the United States of America, the plaintiff herein, by and through Richard G. Callahan, the United States Attorney for the Eastern District of Missouri, and James E. Crowe, Jr. and Gilbert C. Sison, Assistant United States Attorneys for said District, and responds as follows to the objections of the defendant, Shaun R. Hayes, to continue the hearing on his attorney's motion to withdraw as counsel:

The hearing on the defendant's motion is presently scheduled for July 27, 2016 at 9:15. As a courtesy to opposing counsel, we do not object to his request for a continuance. We are concerned, however, that the withdrawal of counsel at this point may significantly delay the progress of this case towards a resolution. As a result, we request that the Court re-schedule the hearing for a date as soon after August 3, 2016 as the Court's schedule permits.

Respectfully submitted,

RICHARD G. CALLAHAN  
United States Attorney

*s/James E. Crowe, Jr.*

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**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that on July 25, 2016, a true and accurate copy of the foregoing was filed via the Court's electronic filing system upon all parties.

*s/James E. Crowe, Jr.*  
JAMES E. CROWE, JR., #23196MO  
Assistant United States Attorney